

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

<b>WSOU INVESTMENTS, LLC D/B/A</b>	§	
<b>BRAZOS LICENSING AND</b>	§	<b>CIVIL ACTION 6:20-cv-00980-ADA</b>
<b>DEVELOPMENT,</b>	§	
<i>Plaintiff,</i>	§	
	§	
<b>v.</b>	§	
	§	
<b>CANON, INC.,</b>	§	
<i>Defendant.</i>	§	
	§	

**DECLARATION OF JONATHAN K. WALDROP IN SUPPORT OF  
PLAINTIFF WSOU INVESTMENTS, LLC’S MEMORANDUM OF LAW  
IN OPPOSITION TO CANON, INC.’S MOTION TO DISMISS**

I, Jonathan K. Waldrop, declare as follows:

1. I am a Partner with the law firm of Kasowitz Benson Torres LLP and am one of the attorneys responsible for the representation of Plaintiff WSOU Investments, LLC d/b/a Brazos Licensing and Development (“WSOU” or “Plaintiff”) in this matter. I make this declaration in support of Plaintiff WSOU’s Memorandum of Law In Opposition To Canon, Inc.’s Motion To Dismiss.

2. If called to testify under oath in court, I could and would testify competently to the facts stated herein.

3. Attached hereto as Exhibit 1 is a true and correct copy of the Memorandum of Law in Opposition to Defendants’ Partial Motion to Dismiss the Complaint, Dkt. 19, in *Canon Inc. v. Avigilon USA Corporation, Inc. and Avigilon Corporation*, Civil Action No. 1:19-cv-10931-NMG (June 28, 2019).

4. Attached hereto as Exhibit 2 is a true and correct copy of Text Order Granting

Motion to Dismiss in *Castlemorton Wireless, LLC v. Comcast Corp.*, No. 20-cv-00034-ADA (W.D. Tex. July 25, 2020).

5. Attached hereto as Exhibit 3 is a true and correct copy of the Transcript of Motion Hearing held before the Honorable Alan D. Albright, Dkt. 107, in *Parus Holdings, Inc. v. Apple, Inc., et al.*, Civil Action No. 1 19-CA-432 ADA (February 19, 2020).

I hereby declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge, information, and belief, formed after reasonable inquiry under the circumstances.

Executed on the 24th day of May, 2021, in San Mateo, California.

/s/ Jonathan K. Waldrop  
Jonathan K. Waldrop